

United States District Court

FILED

JUN 5 2008

NORTHERN DISTRICT OF CALIFORNIA

RICHARD W. WIEKING
CLERK, U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

Venue: San Francisco

V.

ORIGINAL

CRIMINAL COMPLAINT

B7

HONG WEIYAN
(a/k/a ANG WEE YEN)

CASE NUMBER: 3 08 70826

I, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about June 2, 2008 in San Mateo County, in the Northern District of California the defendant did,

OFFENSE: WEIYAN encouraged and induced an alien to come to, enter, and reside in the United States, knowing and in reckless disregard of the fact that such coming to, entry, and residence was in violation of law, in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(iv).

I further state that I am an Enforcement Officer and that this complaint is based on the following facts:
Official Title

SEE ATTACHED AFFIDAVIT IN SUPPORT OF THIS COMPLAINT

PENALTIES: Imprisonment no longer than 10 years;
A fine not to exceed \$250,000.00;
A special assessment of \$100.00; and
Supervised release no longer than three years.

APPROVED AS TO FORM:


ASSISTANT UNITED STATES ATTORNEYContinued on the attached sheet and made a part hereof: ☒ Yes ☐ NoWarrant of Arrest Requested: ☒ Yes ☐ NoBail Amount: **NO BAIL**
Signature of Complainant

Sworn to before me and subscribed in my presence,

5 June 08
Date

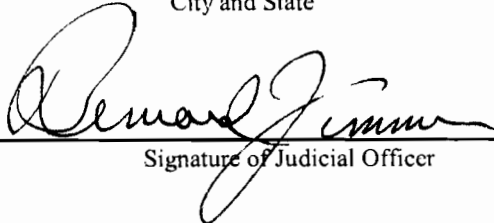
at

San Francisco, California

City and State

Honorable Bernard Zimmerman
United States Magistrate Judge

Name & Title of Judicial Officer


Signature of Judicial Officer

into the United States. WEIYAN also presented an Arrival/Departure Form I-94W (Number 65898017212) and a Customs Declaration Form 6059B to CBP Officer Jeffrey Anderson.

5. During WEIYAN'S immigration inspection at SFO, I read WEIYAN her *Miranda* rights in English, which WEIYAN speaks. WEIYAN waived her *Miranda* rights. I then interviewed WEIYAN. CBP Enforcement Officer Eduardo Reveles witnessed the interview, during which WEIYAN stated the following:

a. WEIYAN met a man named "Mike" in a pub in Singapore during the Chinese New Year celebration in February 2007.

b. In October 2007, "Mike" offered WEIYAN a job to bring him, from Singapore to Japan, airline boarding passes for travel between Narita Airport and Los Angeles International Airport ("LAX"). In exchange, "Mike" offered to pay WEIYAN \$1,000 Singaporean. In December 2007, WEIYAN traveled from Singapore to Narita airport in Tokyo, Japan, and met "Mike" at a restaurant inside the airport. WEIYAN handed "Mike" three airline boarding passes while inside the restaurant. That same day, WEIYAN continued her trip from Japan to LAX. WEIYAN traveled with three female Chinese citizens on her flight to LAX. WEIYAN returned to Singapore three days after she landed at LAX. "Mike" paid her \$1,000 Singaporean in cash for the trip.

c. On June 2, 2008, WEIYAN met two Singaporean women inside a restroom at Changi airport in Singapore. The two women gave WEIYAN two airline boarding passes in the names of TOH HWEE LING and GOH XIAO WEI. Later that day, WEIYAN flew from Singapore to Narita Airport, and brought the boarding passes with her. At Narita Airport, WEIYAN met "Mike" again, and gave him the two boarding passes she received from the two females in the restroom in Changi airport in Singapore. When WEIYAN met "Mike" at the restaurant in Narita airport, two female Chinese citizens were seated next to him.

d. On June 2, 2008, WEIYAN identified the two female Chinese citizens she saw inside the restaurant in Narita airport with "Mike" as two women in a CBP inspection area at SFO. The two female Chinese citizens presented the fraudulent Singaporean passports under the names TOH HWEE LING and GOH XIAO WEI. These are the same names WEIYAN saw on the airline boarding passes handed to her by the 2 females inside the restroom at Changi airport in Singapore which she then handed to "Mike" inside the restaurant in Narita airport in Japan.

6. After the interview described in 5(a)-(d), WEIYAN was placed under oath, sworn, and administratively interviewed by Officer Reveles in English and stated the following:

a. WEIYAN knowingly facilitated the entry of three aliens into the United States by illegal means in December 2007, and two additional aliens by illegal means on June 2, 2008.

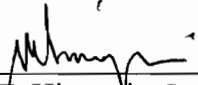
b. WEIYAN received \$1,000 Singaporean from "Mike" for facilitating the entry of the three aliens in December 2007.

c. "Mike" promised to give WEIYAN \$1,000 Singaporean for facilitating the entry of the two aliens on June 2, 2008 by handing him the airline boarding passes at Narita airport. WEIYAN would have received the money upon her return to Singapore.

d. WEIYAN acknowledged what she was doing was illegal, but did it anyway because she has a low paying job in Singapore.

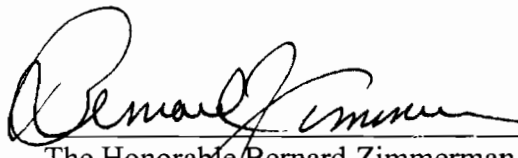
V. CONCLUSION

7. On the basis of the above information, I submit that probable cause exists to believe that HONG WEIYAN a.k.a. ANG WEE YEN encouraged and induced an alien to enter the United States knowing that such entry was in violation of law.



Marciano T. Hinagpis, Jr.
Enforcement Officer
U.S. Customs and Border Protection
U.S. Department of Homeland Security
San Francisco, California

Subscribed and sworn to before me this 5 day of June, 2008.



The Honorable Bernard Zimmerman
United States Magistrate Judge
Northern District of California
San Francisco, California